

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ERNEST COOK)	CASE NO. 4:22-cv-00077 BYP
)	
Plaintiff,)	JUDGE BENITA PEARSON
)	
vs.)	<u>PLAINTIFF'S WITNESS AND</u>
)	<u>EXHIBIT LIST FOR 7/14/23</u>
BOARD OF TRUMBULL COUNTY)	<u>HEARING ON PLAINTIFF'S</u>
COMMISSIONERS.)	<u>MOTION FOR SANCTIONS</u>
)	
Defendant.)	

I. WITNESSES

- A. Michele Nicole Frenchko, as if on cross-examination, as to the “f*ing, c*nt” remark she made, the interactions leading up to it, and the interactions after it.
- B. Kathleen M. Minahan, Esq., as if on cross-examination, as to her statements following the “f*ing c*nt” remark, and her communications with Plaintiff’s counsel subsequent to the deposition.
- C. Patrick Perotti, Esq., as an expert as to the propriety of sanctions with respect to the issue before the Court, as well as the reasonableness of Plaintiff’s counsel’s attorney’s fees and costs request.

II. EXHIBITS

- A. Resume of Patrick Perotti, Esq. (attached as Ex. 1)
- B. Statement of Attorney’s Fees and Costs (attached as Ex. 2)

Respectfully submitted,

/s/ Caryn M. Groedel
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C. CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically this 29th day of June, 2023. Notice of this filing will be sent to all parties by the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Caryn M. Groedel
Caryn M. Groedel